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Attorney for Defendants,

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 JAGROOP SANDHU,) Case No: 3:20-cv-00685-MMD-CLB
11 Plaintiff,)
12 vs.) **MOTION TO EXTEND TIME TO**
13 ENTERPRISE HOLDINGS, INC.; EAN) **RESPOND TO COMPLAINT**
14 HOLDINGS, LLC and ENTERPRISE) **(First Request)**
15 LEASING COMPANY – WEST, LLC)
16 dba ENTERPRISE RENT-A-CAR,)
17 Defendants.)

)

18 Defendants, hereby move this Court for an extension of time up to and including
19 April 2, 2021 to answer or otherwise respond to Plaintiff's Complaint (ECF No. 6).
20 This Motion is based on the records, pleadings and papers on file herein, together with
21 the following Memorandum of Points and Authorities. This is the first request for an
22 extension of this deadline.

MEMORANDUM OF POINTS AND AUTHORITIES

25 As set forth in the Declaration of Scott M. Mahoney, defense counsel has an
26 active employment litigation defense practice, and since the service of the Complaint,
27 has been involved in various litigation activities, including depositions, brief writing,
28 and attendance at a Zoom Early Neutral Evaluation. More time to respond to the

1 Complaint is needed due to these activities and the need to review and more fully
2 understand Plaintiff's allegations and Defendants' position regarding the same. The
3 foregoing constitutes good cause for the requested extension.

4 Respectfully submitted,

5 IT IS SO ORDERED. FISHER & PHILLIPS, LLP

6 Dated: March 11, 2021

7 
8 UNITED STATES MAGISTRATE JUDGE

9 /s/ Scott M. Mahoney, Esq.
10 300 South Fourth Street
11 Suite 1500
12 Las Vegas, Nevada 89101
13 Attorneys for Defendants

14 **CERTIFICATE OF SERVICE**

15 This is to certify that on the 10th day of March 2021, the undersigned, an
16 employee of Fisher & Phillips LLP, electronically filed the foregoing Defendants'
17 Motion to Extend Time to Respond to Complaint with the U.S. District Court, and a
18 copy was electronically transmitted from the court to the e-mail address on file for:

19 Jagroop Sandhu
Jaggul991@yahoo.com

20 A copy was also deposited in the United States mail, with postage prepaid, addressed to
21 Mr. Sandhu at 435 Manciano Way, Reno, Nevada 89521.

22 By: /s/ Sarah Griffin
23 An employee of Fisher & Phillips LLP

24 **FISHER & PHILLIPS LLP**
25 300 S Fourth Street, Suite 1500
26 Las Vegas, Nevada 89101

JAGROOP SANDHU v. ENTERPRISE HOLDINGS, INC. et al.

CASE NO.: 3:20-cv-00685-MMD-CLB

**MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT
(FIRST REQUEST)**

INDEX OF EXHIBITS

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A	Declaration of Scott M. Mahoney, Esq.	001-002

EXHIBIT A

DECLARATION OF SCOTT M. MAHONEY

Scott M. Mahoney states as follows:

1. I am an attorney for the Defendants in this proceeding. I have personal knowledge of, and am competent to testify to, the facts set forth herein.

2. I have an active employment litigation defense practice, and since the service of the Complaint, I have been involved in various litigation activities, including depositions, brief writing, and attendance at a Zoom Early Neutral Evaluation. More time to respond to the Complaint is needed due to these activities and the need to review and more fully understand Plaintiff's allegations and Defendants' position regarding the same. I believe the foregoing constitutes good cause for the requested extension.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 10, 2021.



Scott M. Mahoney

Scott M. Mahoney